

EXHIBIT 3B



INVOICE

Invoice # 62
 Date: 08/08/2022
 Due On: 09/07/2022

7500 Rialto Blvd., Bldg. 1, Ste. 250
 Austin, Texas 78735
 United States

Rodney Mahan

00033-Mahan
 DPS Whistleblower Case

Type	Date	Notes	Quantity	Rate	Total
Service	03/30/2022	Conduct in-depth review of pleadings and MSJ response.	0.85	\$325.00	\$276.25
Service	03/31/2022	In-depth review of first Lopez report narrative.	1.50	\$325.00	\$487.50
Service	04/01/2022	Continue review of Lopez Rpt. 1 for purpose of preparing opening statement.	1.00	\$325.00	\$325.00
Service	04/01/2022	Conduct in-depth review of materials while preparing notes for opening statement: Lopez Report attachments (1.7); Response to motion for summary judgment (.3) Court's SJ order (.2); Timeline of Major events (.20).	2.40	\$325.00	\$780.00
Service	04/01/2022	Conduct in-depth review of the following for purpose of preparing opening statement and cross examinations while contemporaneously taking notes on key points: - Statements taken by Lopez Lt. Brazil (1.8); - Multiple reviews of retaliation memo by Lt. Lopez (.4); - memoranda prepared by counsel regarding timeline of relevant events (.2).	2.40	\$325.00	\$780.00
Service	04/01/2022	Conduct review of remainder of exhibits.	2.90	\$325.00	\$942.50
Service	04/02/2022	Conduct in-depth review of numerous exhibits, jury charge, and statements while outlining opening statement rules and story (2.0). Telephone conference with co-counsel regarding opening statement strategy (.50).	2.50	\$325.00	\$812.50
Service	04/02/2022	Brainstorm on and craft opening rule statements (1.0) Begin preparation of powerpoint for opening (1.2).	2.20	\$325.00	\$715.00
Service	04/03/2022	Conduct in-depth review of the Court's summary judgment order and continue structuring opening statement using powerpoint and timeline.	0.50	\$325.00	\$162.50
Service	04/04/2022	TC w/ Lead co-counsel re motions in limine and damages for all troopers (40). Conduct in-depth review of summary judgment order while contemporaneously preparing damages section of opening statement (1.60)	2.00	\$325.00	\$650.00
Service	04/04/2022	Editing retaliation section of opening statement (.30). Editing damages section of opening statement (.90).	3.10	\$325.00	\$1,007.50

Zoom call with Mahan, Barton, Riggins to prepare trial testimony (1.90).						
Service	04/05/2022	Continue preparing Opening statement PowerPoint and analyzing effective visuals.	0.20	\$325.00	\$65.00	
Service	04/05/2022	In-depth review of verdict form and jury instructions (.20) Further refining of rule statements (.50) Continue crafting opening statement section relating to causation, adverse personnel action, and false reasons for transfer (1.0)	1.70	\$325.00	\$552.50	
Service	04/05/2022	Further preparation of opening statement pertaining to undermining anticipated defenses.	2.10	\$325.00	\$682.50	
Service	04/07/2022	Telephone conference with Riggins for purpose of preparing harms/losses section of opening (1.1) Telephone conference with Mahan for purpose of preparing harms/losses section of opening (1.2)	2.30	\$325.00	\$747.50	
Service	04/08/2022	Conduct in-depth review of Brazil statements and document production regarding Barton, Jr.'s first report. (.60) Make changes to opening statement based on the same (1.0). Prepare section of opening statement pertaining to excuses given by defense for adverse employment actions (.90).	2.50	\$325.00	\$812.50	
Service	04/09/2022	Conduct in-depth review of Lopez reports and statements taken during investigation while contemporaneously preparing bad acts memo for trial team.	2.10	\$325.00	\$682.50	
Service	04/11/2022	Conduct in-depth review of Currie report and affidavit while simultaneously preparing cross-exam of Currie (1.1) Conduct in-depth review of lengthy Major Truett affidavit re retaliation (1.5). Prepare bad acts memo to aid in preparing opening statement (1.6).	4.20	\$325.00	\$1,365.00	
Service	04/12/2022	Conduct in-depth review of all Truett statements while contemporaneously preparing cross examination of Truett.	4.50	\$325.00	\$1,462.50	
						Total \$13,308.75

Please make all amounts payable to: Ben Newman Attorney at Law, PLLC

Please pay within 30 days.